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Attorneys for Proposed Lead Plaintiffs  
Steelworkers Pension Trust and the Police and  
Fire Retirement System of the City of Detroit

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JOEL EICHENHOLTZ, Individually And  
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC.,  
DOUGLAS G. BERGERON, and BARRY  
ZWARENSTEIN,

Defendants.

Case No. 07-cv-06140 MHP

CLASS ACTION

**NOTICE OF MOTION FOR  
CONSOLIDATION AND  
APPOINTMENT OF LEAD  
PLAINTIFFS AND APPROVAL OF  
LEAD PLAINTIFFS' SELECTION  
OF CO-LEAD COUNSEL**

**Date: March 10, 2008**  
**Time: 2:00 p.m.**  
**Courtroom: 15, 18<sup>th</sup> Floor**  
**Judge: Hon. Marilyn H. Patel**

PETER LIEN, Individually And On Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC.,  
DOUGLAS G. BERGERON, and BARRY  
ZWARENSTEIN,

Defendants.

Case No. 07-cv-06195 JSW

Judge: Hon. Jeffrey S. White

BRIAN VAUGHN, RON DOCKSWELL  
and MIRIAM LOGAN, On Behalf of  
Themselves And All Others Similarly  
Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC.,  
DOUGLAS G. BERGERON, and BARRY  
ZWARENSTEIN,

Defendants.

Case No. 07-cv-06197 VRW

Judge: Hon. Vaughn R. Walker

ALBERT L. FELDMAN and ELEANOR  
JEAN FELDMAN, Individually And On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC.,  
DOUGLAS G. BERGERON, and BARRY  
ZWARENSTEIN,

Defendants.

Case No. 07-cv-06218 MMC

Judge: Hon. Maxine M. Chesney

DONALD CERINI, Individually And On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC.,  
DOUGLAS G. BERGERON, and BARRY  
ZWARENSTEIN,

Defendants.

Case No. 07-cv-06228 SC

Judge: Hon. Samuel Conti

WESTEND CAPITAL MANAGEMENT  
LLC, Individually And On Behalf of All  
Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC.,  
DOUGLAS G. BERGERON, and BARRY  
ZWARENSTEIN,

Defendants.

Case No. 07-cv-06237 MMC

Judge: Hon. Maxine M. Chesney

KURT HILL, On Behalf of Himself and All  
Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC.,  
DOUGLAS G. BERGERON, and BARRY  
ZWARENSTEIN,

Defendants.

Case No. 07-cv-06238 MHP

Judge: Hon. Marilyn H. Patel

DANIEL OFFUTT, Individually And On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC.,  
DOUGLAS G. BERGERON, and BARRY  
ZWARENSTEIN,

Defendants.

Case No. 07-cv-06241 JSW

Judge: Hon. Jeffrey S. White

1 EDWARD FEITEL, On Behalf of Himself  
2 and All Others Similarly Situated,

3 Plaintiff,

4 v.

5 VERIFONE HOLDINGS, INC.,  
6 DOUGLAS G. BERGERON, and BARRY  
7 ZWARENSTEIN,

8 Defendants.

Case No. 08-cv-0118 CW

Judge: Hon. Claudia Wilken

1 PLEASE TAKE NOTICE that on March 10, 2008, at 2:00 p.m., or as soon thereafter as  
2 the matter may be heard, in the Courtroom of the Honorable Marilyn H. Patel, United States  
3 District Court, Northern District of California, 450 Golden Gate Ave., San Francisco,  
4 California 94102. Class Members Steelworkers Pension Trust and the Police and Fire  
5 Retirement System of the City of Detroit ("Steelworkers-Detroit P&F" or "Movants") will, and  
6 hereby do, move this Court pursuant to § 21D(a)(3)(B) of the Securities Exchange Act of 1934  
7 ("Exchange Act"), 15 U.S.C. § 78u-4(a)(3)(B), for an order consolidating the nine related  
8 actions and granting Steelworkers-Detroit P&F's motion for appointment as Lead Plaintiffs in  
9 this action and to approve their selection of the law firms of Berger & Montague, P.C. and  
10 Bernstein Litowitz Berger & Grossmann LLP as Co-Lead Counsel for the Class.

11 This motion is made on the grounds that the Movants are the "most adequate plaintiffs"  
12 pursuant to the Exchange Act. See 15 U.S.C. § 78u-4(a)(3)(B). In addition, Steelworkers-  
13 Detroit P&F meet the requirements of Federal Rule of Civil Procedure 23(a) because their  
14 claims are typical of the other Class Members' claims and because they will fairly and  
15 adequately represent the class. Further, Movants have selected and retained counsel with  
16 extensive experience in the area of securities litigation who have successfully prosecuted  
17 numerous securities fraud actions on behalf of injured investors.

18 This Notice of Motion is based upon the Memorandum of Law in support thereof, the  
19 Declaration of Blair A. Nicholas in support thereof, the pleadings and files herein, and such  
20 other written or oral argument as may be presented to the Court. A Proposed Order is also  
21 submitted herewith.

22 Dated: February 4, 2008

Respectfully submitted,

23 BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP

24  
25 /s/ Timothy A. DeLange  
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13 *Attorneys for Steelworkers Pension Trust*

14 ***Proposed Co-Lead Counsel***  
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